Exhibit C

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             IN THE UNITED STATES DISTRICT COURT
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       FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
                   CHARLESTON DIVISION
 4
 5
   IN RE: ETHICON INC., PELVIC ) Master File No.
                                     2:12-MD-02327
6
   REPAIR SYSTEM PRODUCTS ) MDL No. 2327
 7 LIABILITY LITIGATION ) JOSEPH R. GOODWIN
                                     U.S. DISTRICT JUDGE
8
    THIS DOCUMENT RELATES TO )
10
   ALL WAVE 11 DEFENDANTS AND )
11
    SUBSEQUENT WAVE CASES AND )
12
    PLAINTIFFS
                               )
13
14
15
16
    VIDEOTAPED DEPOSITION OF BRUCE S. KAHN, M.D.
17
                  SAN DIEGO, CALIFORNIA
18
                 THURSDAY, AUGUST 1, 2019
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                        11:04 A.M.
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    Reported by: Leslie A. Todd, CSR 5129
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- 1 A Yes.
- 3 TVT device are present with other stress
- 4 incontinence surgeries, such as the Burch procedure
- 5 or autologous -- autologous fascial sling
- 6 procedures."
- 7 Did I read that right?
- 8 A Yes.
- 9 Q The next sentence: "The risk of mesh
- 10 exposure or erosion is arguably unique to mesh-based
- 11 surgeries, but suture exposures or graft exposures
- 12 can occur with non-mesh-based procedures too."
- Did I read that right?
- 14 A Yes.
- Q Why are -- why is mesh exposure or
- 16 mesh erosion arguably unique to mesh-based
- 17 surgeries?
- 18 A It -- because it's mesh. You know,
- 19 mesh -- when you talk about a mesh exposure, it's
- 20 mesh. But you're correct, and it's -- exposures can
- 21 happen of other slings, and I was differentiating out
- 22 synthetic mesh, which is -- you can have exposure of
- 23 an autologous graft for sure.
- So mesh -- you know, synthetic mesh

- 1 erosion is unique. That's all I was -- there's
- 2 nothing -- there's nothing deep there. Simply that
- 3 it's mesh that's unique to it, but you can have
- 4 exposures of other things too.
- 5 Q Or a suture?
- 6 A A suture, yeah.
- 7 Q Does the -- in your mind, does the risk
- 8 of a suture exposure present the same concern as the
- 9 risk of a TVT mesh exposure?
- 10 A Regarding what concerns? I mean --
- 11 Q Meaning are they -- is an exposure of a
- 12 suture as significant as a exposure of a TVT
- 13 product?
- 14 A Yeah, I had one happen actually, a suture
- 15 exposure, a Prolene suture -- mesh exposure after
- 16 a sacro- -- it was not too long ago actually. So a
- 17 procedure called a sacrospinous ligament fixation.
- 18 It's a prolapse procedure. And had a woman who had
- 19 an exposure of her suture, and we had to go back and,
- 20 you know, basically had to take that suture out. And
- it's the same sort of thing. So...
- MR. KOOPMANN: Your time is up, Counsel.
- MR. CLINTON: There we go. All right.
- 24 THE VIDEOGRAPHER: Okay.